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Attorney for Defendant,
HONOR THE EARTH

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

RONEN HELMANN, CAMERON
HIGBY, and JUDIT MAULL,
Plaintiffs,

vs.

CODEPINK WOMEN FOR PEACE, a
California entity, CODEPINK ACTION
FUND, a California entity, HONOR THE
EARTH, a Minnesota entity, COURTNEY
LENNA SCHIRF, and REMO IBRAHIM,
d/b/a PALESTINIAN YOUTH
MOVEMENT, and JOHN AND JANE
DOES 1-20,

Defendants.

CASE NO. 2:24-C-05704-SVW-PVC
*Assigned for all purposes to:
Honorable Stephen V. Wilson*

**NOTICE OF MOTION AND
MOTION TO STRIKE AND
DISMISS PLAINTIFFS' FIRST
AMENDED COMPLAINT**

Hearing Date: November 18, 2024
Time: 1:30 p.m.
Dept.: 10A

TO ALL PARTIES AND THEIR ATTORNEY OF RECORD:

This motion is made following the conference of counsel pursuant to L.R. 7-3 which, took place on October 11, 2024. PLEASE TAKE NOTICE that on November 18, 2024 these matters will be heard, at the First Street Courthouse, located at 350 W. 1st Street, Courtroom 10A, 10th Floor, Los Angeles, California 90012 at 1:30 p.m. Attorney for Defendant Honor the Earth (hereinafter “HTE”) will move the Court to strike and to dismiss the portions of the First Amended Complaint (“FAC”) of Plaintiffs, Ronen Helmann, Cameron Higby, and Judit Maull (hereinafter “Plaintiffs”) naming HTE as a Defendant.

The Motion to Strike is based upon Federal Rules of Civil Procedure, Rule 12(f), as the language which HTE seeks to strike is scandalous, misleading, immaterial, impertinent, unduly prejudicial, and not relevant, and is thus proper and appropriate to be stricken from the FAC. The Motion to Dismiss is based on Federal Rule of Civil Procedure 12(b)(6) and 12(b)(2), on the basis that the FAC fails to state a claim against Defendant HTE and the Court lacks personal jurisdiction over Defendant HTE.

This Notice of Motion is based on the Motion to Strike and Dismiss Plaintiff’s First Amended Complaint and the Memorandum of Points and Authorities, along with all papers and filings in this matter, all matters of which this Court takes judicial notice, all Reply Memorandum of Points and Authorities, and upon such oral argument as may be presented at the hearing.

Dated: October 14, 2024

Respectfully Submitted,

ZAVALA LAW GROUP, P.C.

/s/ N. Joe Innumerable

N. JOE INUMERABLE, ESQ.

Attorney for Defendant

HONOR THE EARTH

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is:

ZAVALA LAW GROUP, P.C.

811 W. 7th Street, Suite 1200
Los Angeles, CA 90017

On October 14, 2024, I served the foregoing document described as **DEFENDANT HONOR THE EARTH'S NOTICE OF MOTION AND MOTION TO STRIKE AND TO DISMISS PLAINTIFFS' FIRST AMENDED COMPLAINT** on the interested parties in this action via CM/ECF system following the Central District of California Local Rules for service upon the parties listed below:

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Attorney for Plaintiffs

Dated: October 14, 2024



Lauren Stiles